

REMARKS

Claims 1-30 are pending in the application.

Claims 1-30 are rejected.

Claims 1, 8, 15, 23, and 29-30 are amended.

Reconsideration and allowance of claims 1-30 is respectfully requested in view of the following:

Responses to Rejections to Claims – 35 U.S.C. §103

Claims 1-30 are rejected under 35 U.S.C. 103(a) as being unpatentable over Guheen et al (U.S. Patent No. 6,957,186) (Guheen hereinafter) in view of Zara et al (U.S. Patent No. 7,117,169) (Zara hereinafter). This rejection is not applicable to the amended claims.

As the PTO recognizes in MPEP §2142:

The Examiner bears the initial burden of factually supporting any *prima facie* conclusion of obviousness. If the Examiner does not produce a *prima facie* case, the applicant is under no obligation to submit evidence of nonobviousness.

The USPTO clearly cannot establish a *prima facie* case of obviousness in connection with the amended claims for the following reasons:

35 U.S.C. §103(a) provides that:

[a] patent may not be obtained...if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains.... (emphasis added)

Thus, when evaluating a claim for determining obviousness, all limitations of the claim must be evaluated. However, the references, alone, or in any combination, do not teach all limitations of any rejected claim.

Claim 1 includes “assembling distinct computer and storage system components for creation of a given solution-based product, wherein the assembling is performed by a manufacturer; assigning a solution identifier to the solution-based product, wherein the solution identifier includes a solution type and a unique identifier within the solution type, wherein there is only one solution identifier assigned to the solution based product, wherein the customer may possess multiple solution identifiers to reflect multiple solution-based products, and wherein the assigning is performed by the manufacturer; storing the solution identifier in a table, wherein the

storing is performed by the manufacturer; providing the solution-based product to a customer, wherein the providing is performed after the solution identifier is assigned, and wherein the providing is performed by the manufacturer; subsequent to the providing the solution-based product to the customer, receiving a request for on-line support from the customer, wherein the request includes the solution identifier, and wherein the receiving is performed by the manufacturer; and using the solution identifier to provide on-line support of the solution-based product to the customer, wherein the using and the providing are performed by the manufacturer.” Guheen and Zara, alone or in combination, do not teach all of these limitations.

The Office Action asserts that a user profile of Guheen corresponds to the solution identifier of claim 1. However, the user profile of Guheen is defined by the user, and is not assigned by a manufacturer to a solution-based product. According to Guheen:

In use, a user enters the system by purchasing products and/or services through a website. As part of the purchase transaction or purchase registration, the user defines the products and services which the user currently possesses or purchases by completing a user profile (user indicia).

col. 239, lines 60-64. Accordingly, Guheen fails to teach assigning a solution identifier to the solution-based product, wherein the assigning is performed by the manufacturer. Zara fails to make up for this deficiency, and the Office Action has made no argument to the contrary. Because the references fail to teach the solution identifier, it follows that the references also fail to teach receiving a request for on-line support from the customer, wherein the request includes the solution identifier, and using the solution identifier to provide on-line support of the solution-based product to the customer.

Also, Guheen teaches that a user has only one user profile. col. 239, lines 60-64. Accordingly, Guheen fails to teach that the customer may possess multiple solution identifiers to reflect multiple solution-based products. Zara fails to make up for this deficiency, and the Office Action has made no argument to the contrary.

Furthermore, the Applicants agree with the Office Action that Guheen fails to disclose that the solution identifier is stored in a table and contains a solution type and a unique identifier within the solution type. page 4, lines 3-6. The Office Action asserts that Zara teaches an asset-detail 500 that corresponds to the solutions identifier, an asset-ID that corresponds to the solution type, and a MAC-detail 510 that corresponds to the unique identifier within the solution type. However, Zara does not teach that the MAC-detail 510 is a unique identifier within the

asset-ID. Instead, Zara teaches that both the asset ID and the MAC-detail 510 are unique to the component. col. 3, lines 2-10; col. 7, lines 38 – 65.

Independent claims 8, 15, 23 and 29-30 are allowable at least for similar reasons as described above for representative claim 1. Therefore, it is impossible to render the subject matter of the claims as a whole obvious based on a single reference or any combination of the references, and the above explicit terms of the statute cannot be met. As a result, the USPTO's burden of factually supporting a *prima facie* case of obviousness clearly cannot be met with respect to the claims, and a rejection under 35 U.S.C. §103(a) is not applicable.


Therefore, independent claims 1, 8, 15, 23 and 29-30, and their respective dependent claims are submitted to be allowable.

In view of all of the above, the allowance of claims 1-30 is respectfully requested.

The amended claims are supported by the original application.

The Examiner is invited to call the undersigned at the below-listed telephone number if a telephone conference would expedite or aid the prosecution and examination of this application.

Respectfully submitted,


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